

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**
Caption in Compliance with D.N.J. LBR 9004-1(b)

GENOVA BURNS LLC Daniel M. Stoltz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. dstoltz@genovaburns.com dclarke@genovaburns.com gkinoian@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Local Counsel to the Official Committee of Talc Claimants</i>	BROWN RUDNICK LLP David J. Molton, Esq. Robert J. Stark, Esq. Michael S. Winograd, Esq. Eric R. Goodman, Esq. dmolton@brownrudnick.com rstark@brownrudnick.com mwinograd@brownrudnick.com egoodman@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 and Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Co-Counsel for the Official Committee of Talc Claimants</i>
MASSEY & GAIL LLP Jonathan S. Massey, Esq. Bret Vallacher, Esq. jmassey@masseygail.com bvallacher@masseygail.com 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Special Counsel for the Official Committee of Talc Claimants</i>	OTTERBOURG P.C. Melanie L. Cyganowski, Esq. Richard G. Haddad, Esq. Adam C. Silverstein, Esq. Jennifer S. Feeney, Esq. David A. Castleman, Esq. mcyganowski@otterbourg.com rhaddad@otterbourg.com asilverstein@otterbourg.com jfeeney@otterbourg.com dcastleman@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 661-9100 Fax: (212) 682-6104 <i>Co-Counsel for Official Committee of Talc Claimants</i>

In Re:	Chapter 11
LTL MANAGEMENT, LLC,¹	Case No.: 23-12825 (MBK)
Debtor.	Honorable Michael B. Kaplan

NOTICE OF MOTION TO SEAL THE REDACTED PORTIONS OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS' PROPOSED FINDINGS OF FACTS AND CONCLUSIONS OF LAW, APPENDIX, AND EXHIBITS THERETO IN SUPPORT OF THEIR MOTION TO DISMISS THE SECOND BANKRUPTCY PETITION OF LTL MANAGEMENT LLC

PLEASE TAKE NOTICE that the Official Committee of Talc Claimants (the “TCC” or the “Committee”) in the above-captioned case of LTL Management, LLC (the “Debtor” or “LTL”), by and through its counsel, will move on, on an expedited basis, before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the “**Motion to Seal**”) for entry of an order, substantially in the form submitted herewith, (A) for authority to file under seal the redacted portions of *The Official Committee of Talc Claimants’ Proposed Findings of Facts and Conclusions of Law in Support of Their Motion to Dismiss the Second Bankruptcy Petition of LTL Management LLC* (the “**TCC’s Proposed FoFs/CoLs**”), the appendix and exhibits attached

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

thereto, filed substantially contemporaneously herewith,² and (B) granting the Committee such other and further relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal.

PLEASE TAKE FURTHER NOTICE that, substantially contemporaneously with the filing of this Motion to Seal, the TCC has filed an Application for Order Shortening Time and Certain Other Relief (the “Scheduling Application”) requesting that the hearing on the Motion be scheduled for July 27, 2023. **TAKE NOTE that the order entered with respect to the Scheduling Application will, among other things, specify the date and time of the hearing on the Motion to Seal.**

PLEASE TAKE FURTHER NOTICE that, the TCC shall rely upon the application filed herewith in support of the relief sought by this Motion to Seal, and that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the supporting application filed with the Motion to Seal.

PLEASE TAKE FURTHER NOTICE that, oral argument is requested, unless the Court directs that no oral argument would be necessary.

PLEASE TAKE FURTHER NOTICE, that all objections, if any, must be made accordance with the Court’s order entered with respect to the Scheduling Application. If the order entered with respect to the Scheduling Application directs that written objections be filed, then in accordance with D.N.J. LBR 9013-2(a)(2), written objections shall be filed with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street,

² A redacted version of the TCC’s Proposed FoFs/CoLs has been filed immediately prior to the filing of this Motion to Seal. An unredacted version of the TCC’s Proposed FoFs/CoLs, appendix, and exhibits are being filed immediately after the filing of this Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (*see [Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey \(uscourts.gov\)](#)*).

Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920, so they are received by the deadline set forth in the Court's order entered with respect to the Scheduling Application.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: July 19, 2023

GENOVA BURNS LLC

By: /s/ Daniel M. Stolz

Daniel M. Stolz, Esq.

Donald W. Clarke, Esq.

110 Allen Rd., Suite 304

Basking Ridge, NJ 07920

Tel: (973) 230-2095

Fax: (973) 533-1112

Email: DStolz@genovaburns.com

DClarke@genovaburns.com

*Local Counsel for the Official
Committee of Talc Claimants*